

EXHIBIT B

August 23, 2019 Email from Sam Castor to Ronald
Green

From: **Sam Castor** sam@switch.com

Subject: Re: MTech adv. Switch

Date: August 23, 2019 at 4:31 PM

To: Ron Green rdg@randazza.com

Cc: Anne-Marie Birk abirk@switch.com, Piers R. Tueller ptueller@hutchlegal.com, Marc Randazza mjr@randazza.com, Alex Shepard ajs@randazza.com, Crystal Sabala ccs@randazza.com

SC

Ron,

As discussed, I've attached updated documents which now contain a clause that the inclusion of the Exhibits A and B does not constitute waiver of either party's right to challenge those categories, or resulting designations.

I understand you want to talk to your client and we'll touch base again Monday. Let me know if the attached works.

If we don't hear from you Monday, or don't reach agreement, we'll file separate protective orders.

Happy Friday.



SAM CASTOR

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e sam@switch.com

From: Samuel Castor <sam@switch.com>

Date: Friday, August 23, 2019 at 4:10 PM

To: Ron Green <rdg@randazza.com>

Cc: Anne-Marie Birk <abirk@switch.com>, "Piers R. Tueller" <ptueller@hutchlegal.com>, Marc Randazza <mjr@randazza.com>, Alex Shepard <ajs@randazza.com>, Crystal Sabala <ccs@randazza.com>

Subject: Re: MTech adv. Switch

Ron,

Reattached (clean and redline).

I disagree with your characterization of the facts. And I still remain hopeful that a quick convo will resolve this.

Calling you.

SAM CASTOR



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From: Ron Green <rdg@randazza.com>

Date: Friday, August 23, 2019 at 2:59 PM

To: Samuel Castor <sam@switch.com>

Cc: Anne-Marie Birk <abirk@switch.com>, "Piers R. Tueller" <ptueller@hutchlegal.com>, Marc Randazza <mjr@randazza.com>, Alex Shepard <ajs@randazza.com>, Crystal Sabala <ccs@randazza.com>

Subject: Re: MTech adv. Switch

Sam:

I need to discuss your proposed language with my clients, and I am working on a deadline in another matter for this afternoon. So I doubt you will have our position today, which is essentially the deadline your email provides. Given that I have not heard from you guys with regard to our suggested changes for a week, your deadline of a few hours is unreasonable. However, I do agree that we need to get this resolved very soon, and I will speak with my clients about your proposed language as soon as possible.

I would prefer to speak with you after I have spoken to my clients. Until I have their input, I am unsure how useful a call will be between us. However, I am in the office this afternoon if you feel that speaking with me for a few minutes would be productive.

Additionally, since it is fairly likely that we will have some differences regarding the final language of the Protective Order, I had previously suggested asking the Court for a Case Management Conference so that both parties can discuss their concerns over the language of the Protective Order with the Magistrate Judge. Your email seems to indicate that you have rejected that suggestion. Am I correct in making that assumption? If I am correct, I will likely be filing a request for a Case Management Conference anyway, so that I can detail to the Court any concerns relating to the edits you made to the Protective Order, assuming any remain.

Finally, you sent me two documents. One is marked "REDLINE" and one is marked "CLEAN." However, both contain redlines, and they appear to be identical. Please confirm.

Ronald D. Green* | **Randazza Legal Group, PLLC**
2764 Lake Sahara Drive | Suite 109 | Las Vegas, NV 89117
Tel: 702-420-2001 | Email: rdg@randazza.com

* Licensed to practice law in Nevada.

On Aug 23, 2019, at 12:57 PM, Sam Castor <sam@switch.com> wrote:

Ron,

I have attached a (clean and redlined) copy of the PO we plan to file Monday, if we don't reach agreement.

We have proposed alternative language that I hope gets us both there. In the hopes this can be resolved with a bit more discussion, I'd like to schedule one last call to discuss the attached.

When are you free today?



SAM CASTOR

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From: "Piers R. Tueller" <ptueller@hutchlegal.com>
Date: Wednesday, July 31, 2019 at 5:14 PM
To: Ron Green <rdg@randazza.com>
Cc: Samuel Castor <sam@switch.com>, Anne-Marie Birk <abirk@switch.com>
Subject: MTech adv. Switch

Ron –

It was good to chat with you earlier this afternoon. Per our conversation I look forward to seeing your revisions to the protective order today. Once I've had a chance to review and have discussed it with Sam I will reach out to address any additional issues.

Thanks,

Piers R. Tueller
Attorney



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<2019.08.23 DRAFT Stipulated Protective Order - REDLINE.docx><2019.08.23 DRAFT Stipulated Protective Order - CLEAN.docx>



2019.08.23
DRAFT...N.docx



2019.08.23
DRAFT...E.docx